

In the District Court of the United States
for the Middle District of Alabama
Northern Division

DeAngelis Manuel
#266916

plaintiff

2021 JUN 21 A 11:28

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT

MIDDLE DISTRICT ALA
Civil Action No. 2:19-cv-105-MHT

J.

Kay Ivey et al
defendants

Motion to corroborate with factual evidence

I ask this honorable court to please consider and
weigh all exhibits please

Kay Ivey as Respondent Superior

when governor Kay Ivey issued her moratorium she instantly
became the Superior officer over the parole board
as seen⁽¹⁾ with her Moratorium compelling the Board
members to act or respond in any manner and⁽²⁾ with
the considerations and granting of parole in a downward spiral
since her Moratorium with the only aim of keeping us
in prison, even people like myself that was
already granted parole.

please take note that its public

record that GEO and Cosecivic endorsed her gubernatorial
campaign the same Geo and Cosecivic she was trying
⁽³⁾ to proceed to have them build private prisons that
would be leased to alabama which was strongly
opposed by other political leaders and the DOJ

to impose supervisory liability under 42 USC § 1983 plaintiff must demonstrate that officials has actual or notice of unconstitutional practice and demonstrates gross negligence or deliberate indifference by failing to act *Nericis v. Vivoni*, 249 F.Supp.2d 146 they governos say they had an ample amount of opportunity to tell her parole board to ~~not~~ ^{they} use Jimmy Spencer against us and her moratorium was not to affect any body our side of its 75 day effect

to tie any individual to conspiracy more than a vague conclusory allegation charging that individual with participation in the conspiracy are necessary, under conspiracy theory participation need not extend to acts leading to deprivation of rights which at least extend to conspiracy itself conspiracy can cause deprivation of right by a policy or custom and demonstrate causal connection between conspiracy and deprivation of constitutional rights *Singer v. Wadman*, 595 F. Supp. 188 she's well aware her moratorium had an adverse effect beyond the scope of her 75 day period defendants who engage in private conduct may be found liable if it is established that they have acted in concert with another party against whom valid claimed can be stated *Brikey v. California*, 564 F.2d 849 through Lynn head the governos had my people rescheduled and through the new members she appointed she's been keeping us in person by her position of members that will carry out

her will

This is the biggest conspiracy since the Pledge system that re-subjugated blacks back into slavery using trumped up judicial proceeding after the abolition of slavery until 1945 with Alabama being the leading state in the Neo Slave Pledge System

in a meeting comprised of Republicans with Governor Ivey being chief officer of the state and a Republican the statement was made keep them in prison for as long as their sentence will allow as seen in exhibits 1A with a statement like that why does Alabama have a parole board like I told this honorable court people are being denied parole before they're even considered in violation of our 14th amendment 10th, 9th and 8th amendment and Subsequent Due process even people like me that was already paroled

Please keep note I'm suing all in ^{their} ~~their~~ official and individual capacity and I ask to be awarded every relief warranted in addition to 5,000,000 in damages this court sees the deliberate indifference amid all the violence going on in these overcrowded inhumane prisons and the ~~keep~~ hopelessness created by a governor and parole board that's holding us accountable for joining Sheneed's action's

I ask you now to say Ivey in my campal discovery
in regards to jimmy spencer if the board was in
violation why weren't the held responsible under
Title 15 section 15-22-39 and section 15-22-40
of the Code of Alabama that can be discovered
the reason Title 15 and the section there of wasn't
in force because the board didn't do anything
wrong and under the stringer condition at
Title 15 section 15-22-39 and 15-22-40
the board ~~should~~ would have fought her
metatiorism tooth and nail in regard to
jimmy Spencer release on parole and she knew
the board didn't do anything wrong by releasing
jimmy Spencer Spencer did 29 years on
life with the possibility of parole but the
board did go along with her political motive
which she called a metatiorism with no harm
to anybody but the inmates locked up in alabam

Administrative Procedure Act: a court must hold unlawful and set aside agency action findings conclusions found to be arbitrary and capricious and an abuse of discretion or otherwise not in accordance with law 5 U.S.C.S § 706 an agency action is arbitrary and capricious where (1) the agency relied on factors which Congress or legislation has not intended for it to consider I'm not Timmy Spencer and my parole was ignored before the governor's moratorium

Abuse of process

Perversion of law fully intended process to illegitimate ends they thought they would be able to mask their unlawfully conduct and political ruse with talk of public protection and inmates not having a liberty instead with the parole board being so pliable under the hand of governor kagney and her cronies direction you can see the underlying conspiracy

I'm being held only because of Jimmy Spencer and
a governor that's using her exclusive position to
enforce her political motive and that's easy to
do against sub classes or minority groups such as
inmates -

I hope this honorable court can see what's going
on by the record and on its face

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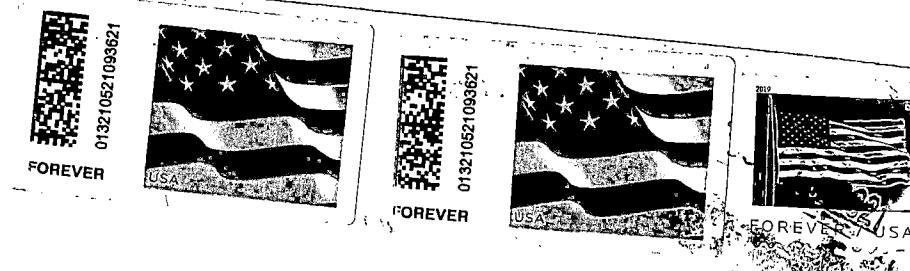
Certificate of Service

I hereby certify that I mailed a copy of
the foregoing to
Greg Lock Mer
Assistant Attorney General
Alabama Bureau of Pardons & Paroles
100 Capitol Commerce Blvd, Suite 310
Montgomery, AL 36117

Done this 18th of June

R. Kyle Mann
DeAngelis, Mannes

DeAngelo Manuel # 266719
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This Correspondence is forwarded from an Alabama State Prison. The contents have not been evaluated and the Alabama Department of Corrections is not responsible for the substance or content of the enclosed communication.

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